

(234)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWAREPOWER INTEGRATIONS, INC., a
Delaware corporation,

Plaintiff,

v.

FAIRCHILD SEMICONDUCTOR
INTERNATIONAL, INC., a Delaware
corporation, and FAIRCHILD
SEMICONDUCTOR CORPORATION, a
Delaware corporation,

Defendants.

C.A. No. 04-1371 JJF

REDACTED

**DECLARATION OF SEAN P. HAYES IN SUPPORT OF
POWER INTEGRATIONS' JOINT COUNTERSTATEMENT IN RESPONSE TO SIX
OF FAIRCHILD'S SEVEN MOTIONS FOR SUMMARY JUDGMENT**

FISH & RICHARDSON P.C.

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Date: April 7, 2006

I, Sean P. Hayes, declare as follows:

1. I am an associate of Fish & Richardson P.C., counsel of record in this action for Plaintiff Power Integrations, Inc. ("Power Integrations"). I am a member of the Bar of the State of Delaware. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached as Exhibit A is a true and correct copy of the Rebuttal Expert Report of Robert Blauschild (with exhibits omitted).

3. Attached as Exhibit B is true and correct copy of excerpts from the deposition of Fairchild's technical expert Paul Horowitz, taken on February 4, 2006.

4. Attached as Exhibit C is true and correct copy of excerpts from the deposition of Power Integrations' technical expert Robert Blauschild, taken on January 31, 2006.

5. Attached as Exhibit D is a true and correct copy of the Rebuttal Expert Report of Robert Blauschild (with exhibits omitted).

6. Attached as Exhibit E is a true and correct copy of the Opening Expert Report of Mike Shields on Infringement (with exhibits A - H and J - N omitted).

7. Attached as Exhibit F is a true and correct copy of the Opening Expert Report of Dr. Peter S. Gwozdz regarding Invalidity (with exhibits omitted).

8. Attached as Exhibit G is a true and correct copy of the Supplementary Expert Report of Dr. Peter S. Gwozdz (with exhibits omitted).

9. Attached as Exhibit H is a true and correct copy of the Rebuttal Expert Report of Michael Shields (with exhibits omitted).

10. Attached as Exhibit I is a true and correct copy of excerpts from the deposition of Power Integrations' technical expert Michael Shields, taken on February 16, 2006.

11. Attached as Exhibit J is a true and correct copy of excerpts from the deposition of Power Integrations' CEO, Balu Balakrishnan, taken on November 17, 2005 and March 15, 2006.

12. Attached as Exhibit K is a true and correct copy of excerpts from the deposition of Power Integrations employee Leif Lund, taken on August 15, 2005.

13. Attached as Exhibit L is a true and correct copy of excerpts from the deposition of Power Integrations employee Alex Djenguerian, taken on August 23, 2005.

14. Attached as Exhibit M is a true and correct copy of excerpts from the deposition James Go, taken on September 14, 2005.

15. Attached as Exhibit N is a true and correct copy of excerpts from the deposition of inventor Klas Eklund, taken on October 14, 2005.

16. Attached as Exhibit O are true and correct excerpts from the deposition of Jan Brunnberg, taken on October 27, 2005.

17. Attached as Exhibit P is a true and correct copy of a September 30, 2005 Memorandum from Fairchild employee Bob Conrad bearing Fairchild production number FCS1686116.

18. Attached as Exhibit Q is a true and correct copy of excerpts from the deposition of Fairchild employee Thomas Beaver, taken on January 11, 2006.

19. Attached as Exhibit R is true and correct a copy of Power Integrations' damages expert Richard B. Troxel's Expert Report on Damages (with exhibits omitted).

20. Attached as Exhibit S is a true and correct copy of a December 16, 2005 Declaration of Dell employee Andrew Khor.

21. Attached as Exhibit T is a true and correct copy of the rough transcript from the deposition of third party Shawn Slayton, taken on March 31, 2006.

22. Attached as Exhibit U is a true and correct copy of an analyst report regarding Power Integrations issued by S.G. Cowen on February 3, 2006.

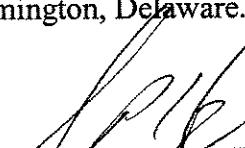
23. Attached as Exhibit V is a true and correct copy of Fairchild's damages expert Michael Keeley's Rebuttal Expert Report on Patent Damages (with exhibits omitted).

24. Attached as Exhibit W is a true and correct copy of a June, 2005 Fairchild presentation regarding Fairchild Power Switch (FPS) products bearing Fairchild production numbers FCS1687871-98.

25. Attached as Exhibit X is a true and correct copy of Fairchild's revised privilege log, served on November 16, 2005.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 7th day of April, 2006, at Wilmington, Delaware.



Sean P. Hayes

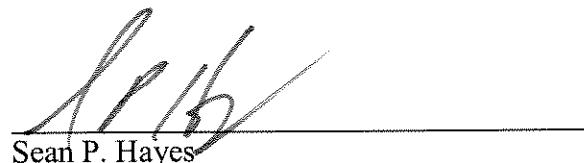
CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2006, I electronically filed a REDACTED DECLARATION OF SEAN P. HAYES IN SUPPORT OF POWER INTEGRATIONS' JOINT COUNTERSTATEMENT IN RESPONSE TO SIX OF FAIRCHILD'S SEVEN MOTIONS FOR SUMMARY JUDGMENT with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the following:

Steven J. Balick, Esq.
John G. Day, Esq.
Ashby & Geddes
222 Delaware Avenue, 17th Floor
P. O. Box 1150
Wilmington, DE 19899

I hereby certify that on April 14, 2006, I have sent via United States Mail, to the following non-registered participants:

Bas de Blank
Orrick, Herrington, Sutcliffe LLP
1000 Marsh Road
Menlo Park, CA 94025



Sean P. Hayes

A handwritten signature in black ink, appearing to read "SPH", is written over a horizontal line. Below the line, the name "Sean P. Hayes" is printed in a standard font.